



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking into the Review  
Of the California High Cost Fund B Program

Rulemaking 06-06-028

PHASE II REPLY COMMENTS OF AT&T CALIFORNIA (U 1001 C);  
AT&T ADVANCED SOLUTIONS INC. (U 6346 C); AT&T COMMUNICATIONS OF  
CALIFORNIA (U 5002 C); TCG SAN FRANCISCO (U 5454 C); TCG LOS ANGELES,  
INC. (U 5462 C); TCG SAN DIEGO (U 5389 C); AND AT&T MOBILITY LLC (NEW  
CINGULAR WIRELESS PCS, LLC (U 3060 C); CAGAL CELLULAR COMMUNICATIONS  
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AT&T<sup>1</sup> hereby provides its reply to the comments on the proposed California Advanced Services Fund (“CASF”) as requested by the Assigned Commissioner’s Ruling on Phase II Issues Relating to the “California Advanced Services Fund” (“Ruling”).

**I. THE COMMISSION SHOULD CLEARLY DEFINE THE REQUIREMENTS FOR CASF ELIGIBILITY UP FRONT.**

**A. The Governor's Broadband Task Force Mapping Should Be Sufficient.**

Sprint Nextel proposes (at 14) that before deciding whether the CASF is needed, the Communications Division should be directed to gather a host of information regarding broadband service. While it makes sense to know the current availability of broadband in California (and which areas do not have access to the services eligible for funding), a substantial amount of this data gathering has occurred through the mapping efforts of the Governor's Broadband Task Force ("Task Force").<sup>2</sup> Admittedly the data may not be complete in that they do not include all technologies (most notably absent are wireless and satellite broadband offerings), but this mapping effort should be sufficient for a starting point. At a minimum, it would be more efficient for the Commission to use the Task Force data as a starting point rather than having the Communications Division undertake a large, burdensome data gathering and mapping project from scratch.<sup>3</sup>

**B. The FCC's Minimum Speed For Broadband Is A Good Benchmark.**

The Ruling suggests that any area without access to service with download speeds of 3 Mbps and upload speeds of 1 Mbps would be eligible for subsidy, even if broadband service is available in those areas at lower speeds. While such speeds may be a worthwhile goal, and while the Commission may choose to give preference to applications for higher-speed facilities, AT&T recommends that the limited public dollars available for a broadband subsidy not be used in areas where broadband service is already available. The CASF should not subsidize areas where

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<sup>2</sup> See, e.g., California Broadband Task Force Letter to Broadband Providers (June 28, 2007).

<sup>3</sup> The data gathering could well prove problematic given the Commission's limited jurisdiction over broadband providers.

broadband service *already* exists, as that would take support away from other areas where no broadband service is available, even below 3 Mbps/ 1 Mbps.<sup>4</sup> Nor does AT&T support having such a high minimum speed as a hard and fast requirement for supported facilities; such a requirement would eliminate support for worthwhile broadband projects at lower speeds which might otherwise be the only reasonable option for unserved areas. Thus, AT&T proposes that the Commission use the definition of broadband service adopted by the FCC (200 Kbps) or the definition used by the Task Force (500 Kbps combined) as a minimum speed requirement, as both the trigger for defining an eligible area and the minimum speed of supported facilities. The program could, at the same time, give preference to facilities capable of higher speeds such as 3 Mbps download/ 1 Mbps upload when they are proposed.

While various parties support the 3 Mbps/ 1 Mbps as targets, no party presents any evidence for making those targets a requirement as opposed to a preference. DRA notes (at 7-8, fn. 9) that the speed of the broadband service can affect the availability of VoIP and recommends (at 5) against lowering the speed requirements. However, DRA's premise is incorrect. VoIP does not require facilities with 3 Mbps upstream / 1 Mbps downstream capability. In fact, VoIP applications do not require speeds greater than the FCC's definition.<sup>5</sup>

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<sup>4</sup> As noted in our opening comments (at 7), AT&T does not support a plan that would offer a subsidy for subsequent providers. However, if the Commission chooses to adopt a plan that does differentiate between unserved and underserved areas, AT&T supports the proposal raised by Sprint Nextel (at 23, fn. 42) that the existing broadband service provider be able to dispute the categorization of its existing service area.

<sup>5</sup> For example, third party VoIP providers Vonage and Skype state the following with respect to the data transfer speeds needed to use their services:

"What do I need to use Vonage?... Vonage recommends an upload speed of 90kbps or greater. An upload speed less than 90kbps could affect the quality of your calls." (available at: [http://vonage.com/help.php?article=497&category=123&nav=102&refer\\_id=WEBAV0706010001W1](http://vonage.com/help.php?article=497&category=123&nav=102&refer_id=WEBAV0706010001W1));

"What kind of internet connection do I need to use Skype. The minimum internet requirements to use Skype are a dial-up connection with at least a 33.6Kbps modem. However, to get the best results out of Skype we suggest that you have a broadband internet connection (cable, DSL, etc). GPRS is not supported for voice calls and results using satellite internet connections may vary." (available at: [http://support.skype.com/index.php?\\_a=knowledgebase&\\_j=questiondetails&\\_i=396](http://support.skype.com/index.php?_a=knowledgebase&_j=questiondetails&_i=396)).

**C. The Idaho Program Provides Useful Insights.**

Verizon attached to its comments the "Rural Idaho Broadband Investment Program – Proposal Submission Guide" as an example of the type of criteria that are needed for the CASF. AT&T agrees that clear and objective criteria for the selection process are necessary, and the Idaho program generally provides good examples. AT&T does not, however, agree that broadband facilities be defined as in the Idaho program. Instead, as described above, AT&T recommends that the Commission use the FCC's definition or the minimum speed used to map broadband by the Task Force as the minimum required speed, while giving preference to applications for facilities of higher-speed capability. Also, the Idaho program allows municipalities to be eligible to receive a subsidy. Under California law, municipalities are not telephone corporations under § 234, and should not participate in the CASF.

**D. A Pilot Program Has Advantages.**

Sprint Nextel suggests (at 17) that the Commission would do well to initiate the CASF as a pilot program. AT&T agrees. As the comments describe, there are a host of legal and practical issues that need to be addressed. A pilot program will give the Commission time (and experience) to address those issues, and to flesh out the processes for CASF applications, the receipt of matching funds, and verification that the broadband was built with the capabilities promised. AT&T suggests a modest pilot program, perhaps focusing on a limited number of geographic areas where the desired broadband capability is not present, with no more than \$5M being available. The Commission could conduct the pilot program while any legal issues are resolved by the Commission or the legislature.

**II. THE COMMISSION SHOULD ADOPT AT&T'S PROPOSALS FOR THE APPLICATION PROCESS.**

**A. The Commission Should Require Carriers To Submit Applications On A Single Deadline, Rather Than Opening A "Window" For A Second Round Of Applications.**

AT&T recommends that the Commission establish a single deadline for applicants to submit a single round of applications. As AT&T explained in our opening comments, a single

deadline will encourage carriers to make their best case up front, rather than waiting to undercut their competitors unfairly in the second round. Verizon agrees (at 12) that a second round of applications would “delay and complicate the application process unnecessarily,” and that “the first carrier to submit an application would be disadvantaged if a competing carrier had access to project details.” Some commenters support having a second round of applications, with a “window” opened for competing applications within a specified time of the first round of filings. The commenters do not agree, however, on the particulars: SureWest supports the 60-day window posited in the Ruling, while DRA is unsure about the time period, and Sprint Nextel appears unsure about allowing a second filing under any deadline.

The Commission should set a single filing deadline. A single deadline will not result in a “race to the Commission” nor will it reward the application that is filed first, the way Sprint Nextel suggests (at 22-23). All applicants will have the same deadline, and all applications filed on time will receive the same consideration on their merits. This approach is the one most likely to result in the best applications, and is generally used in these kinds of competitive bidding situations. Because applicants will have only one shot, and do not know what their competitors will say, they will have to present their best applications on the first try.

By contrast, a second round of applications will *not* encourage carriers to put their best applications forward. On the first round, applicants will be reluctant to apply, because that would simply open the door to competing applications. Sprint Nextel thus acknowledges (at 23) that the two-round approach “would likely result in funding applicants being reluctant to ‘go first,’ since other parties then would have 60 days in which to design a competing, and possibly superior, proposal.” Even on the second round, carriers will not have an incentive to make their *best* offer; rather, their incentive would be to undercut the opening bid by just enough to win.

**B. Support Amounts Should Be Limited To A 50 Percent Match; Otherwise, Applicants Should Decide What Amount Is Needed To Make Deployment Economic.**

The Ruling suggests that support amounts would be provided only as matching funds, implying support would be limited to a maximum of 50 percent of project cost. As discussed in

our opening comments, AT&T strongly supports this limitation, as it ensures carriers will only seek support for projects upon which they are willing to risk a substantial amount of their own funds. Further, AT&T recommends that the Commission give greater weight to applicants that commit to an even higher percentage of self-funding in their project applications.

Sprint Nextel asks (at 15) whether funding should be limited to the “funding increment necessary for making an uneconomic project economic?” Sprint Nextel provides no recommended answer, and no guidance as to how this “increment” would be calculated in the real world if the Commission decided to adopt it. AT&T recommends that the Commission not take the “increment” approach. First, it would be exceedingly difficult to implement such an approach in practice, as there is no real definition of what an “uneconomic” project is, and no guidelines for calculating the “increment” between uneconomic and economic. To take just one pivotal example, the Commission would have to decide how to estimate future revenues (which would require speculation about what services the customers in an unserved area would buy, and how much they would pay, where by definition there is no track record of past broadband purchases) *and* future expenses (which would almost certainly lead to disputes and litigation about what types of expenses should be counted).

Second, calculating support as the increment between an “uneconomic” and “economic” project would likely reward carriers that are less effective in making a profit on their own, or have a more costly technology. All else equal, the increment approach would provide more support to carriers that are less efficient in controlling costs and/or less effective in selling services and generating revenue -- or worse, carriers that overestimate costs and underestimate revenues in their applications. In theory, the Commission could calculate support based on the increment of a hypothetical “efficient carrier,” but in practice it would be impossible to determine the level of expenses and revenues that would be “efficient” for an unregulated service in an unserved area.

Third, calculating the “funding increment” would essentially involve the Commission in rate-of-return management on what the FCC has determined are clearly unregulated services.

The Commission would have to decide what expenses are justified and what level of return makes a project “economic.” Such an approach would be a step backwards in this era of deregulation, and would greatly discourage providers from participating.

The Commission can avoid all of these drawbacks by letting the applicants themselves decide how much funding to seek, while setting an upper limit on the percentage of funds they can obtain from the CASF (such as 50%). In addition, by granting a preference to those applicants that commit to fund more of their projects with their own money, the Commission will encourage carriers to seek less support from the CASF. In this manner, healthy competition -- among applicants seeking support -- will drive applicants to minimize the percentage of CASF support they request.

For the same reason, the Commission should reject SureWest’s proposal (at 3) that every applicant should be required to demonstrate that the area to be served is “uneconomic.” In practice, it would be highly difficult for parties to prove, or for the Commission to verify, that an area is unserved because it is uneconomic. It is true that carriers prioritize their deployment, but it seems unlikely that such prioritization would account for an area being unserved by *any* carrier. More importantly, the premise of the CASF is that the State wants to take some affirmative action to speed deployment, rather than waiting for carriers to work their way down their list of priorities. The better approach would be to wait for the Broadband Task Force to identify the areas that should receive support (as AT&T recommended in our opening comments). This would allow applicants to focus their efforts on developing a plan to serve those areas rather than on trying to prove the need for support.

**C. The Commission Should Not Impose A Bonding Requirement.**

All parties appear to agree that applicants should fulfill their deployment promises, and that the Commission should not throw money at projects where there is some material risk that the deployment will not be completed. One way to provide assurance is a performance bond; an applicant certainly may offer to put up such a bond, and the Commission certainly may consider that offer in ruling on the application. But AT&T disagrees with DRA’s proposal (at 10) that a



performance bond be required in all cases. For established providers that have a proven track record of successful deployment, a performance bond would be an unnecessary expense that provides no real added benefit and might instead deter worthwhile projects. An applicant might also volunteer alternative ways to assure the Commission that it will perform on its commitments, and the rules establishing the Fund should give the Commission flexibility to find those alternative assurances to be sufficient.

**D. The Commission Should Consider Each Applicant's Commitments On Rates, But It Should Not Impose Rate Caps.**

As AT&T demonstrated in our opening comments, the Commission should encourage applicants to make voluntary commitments as to the rates they will charge customers if funding is granted, and it should grant a preference to the applicants that make the best (and most solid) commitments. The Ruling appears to contemplate such voluntary commitments, by stating that Staff should choose applications that promise the lowest price per Mbps. AT&T does not agree, however, with DRA's proposal (at 5) that the Commission impose mandatory caps on broadband rates. Mandatory price regulation would be a step away from the Commission's progress towards deregulation, and it would discourage parties from submitting applications or deploying facilities in unserved areas. Furthermore, as Verizon points out (at 11-12), broadband providers typically use regional or national pricing plans, and rate caps would interfere with this practice. Moreover, broadband service is usually provided in a bundle of services and is an unregulated interstate service over which the Commission has no regulatory authority.

The better approach is to work within a competitive, deregulatory model, rather than against it. If an applicant is confident enough in its estimates to make a commitment on price, it will make that commitment to increase its chances of winning the competition for funds. In this way, the market will set prices, rather than the Commission. So long as any commitment on price (or price per Mbps) is purely voluntary, the Commission would also mitigate Verizon's concerns (at 11-12) regarding the effect of price commitments on a competitive market.

### **III. THE COMMISSION SHOULD ADOPT EFFECTIVE RECORDKEEPING AND AUDIT REQUIREMENTS.**

#### **A. The Commission Should Adopt Effective Recordkeeping And Audit Requirements.**

Effective recordkeeping and audit requirements are essential if the CASF is to have any hope of achieving its goals, and AT&T's opening comments set forth several recommendations for such requirements. Sprint Nextel asserts (at 23-24) that auditing "will be difficult" or even "impossible." That does not have to be the case. There are numerous government programs that conduct audits of private parties that receive government support, and this Commission has audited telephone corporations before. The key is to ensure that the recipients maintain adequate records and internal controls, to make their work transparent and easier to audit. The Commission should favor applications that demonstrate a commitment to adequate recordkeeping and sound controls, and conversely it should reject applications that do not demonstrate such a commitment. Finally, the Commission should warn support recipients that they may lose funding if they do not carry out their promises or if they do not cooperate in the audit process.

#### **B. Commission Staff Should Verify But Not Audit Grants.**

SureWest proposes (at 6) that "Commission Staff should be assigned to audit each project ..." AT&T agrees that Commission Staff should verify that project tracking codes match the geographic area for which funding is sought, and that grant payments be made after the party has provided documentation to Staff showing that supported investments have been made. But auditing means much more. Rather than laying such a substantial burden on Staff, audits should be done by independent auditors in accordance with appropriate professional standards.<sup>6</sup> Compliance (or non-compliance) with the CASF requirements is a serious matter, and should be evaluated by independent professionals.

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<sup>6</sup> See Opening Comments of AT&T, p. 19.

**C. Customer Complaint Data Regarding Broadband Are Not Necessary.**

DRA recommends (at 11) that carriers be required to keep customer complaint data, and contends "[t]he Commission may be the most appropriate entity to resolve complaints from customers."<sup>7</sup> While consumer complaints may in some cases provide information to help the Commission verify that the speeds promised in an application for a matching grant are achieved and maintained, that possibility is not a sufficient basis for burdensome tracking and reporting requirements. More importantly, since broadband is an unregulated, interstate service, the Commission is not an appropriate forum for resolving complaints from customers about their broadband service.<sup>8</sup>

Dated at San Francisco, California, this 3<sup>rd</sup> day of October 2007.

Respectfully submitted,

/s/  
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<sup>7</sup> *Id.* at fn. 11.

<sup>8</sup> Any reporting that is required should be consistent with the requirements of § 5950.

CERTIFICATE OF SERVICE

I, Morena E. Lobos, hereby certify that I have this day served a copy of the foregoing **PHASE II REPLY COMMENTS OF AT&T CALIFORNIA (U 1001 C); AT&T ADVANCED SOLUTIONS INC. (U 6346 C); AT&T COMMUNICATIONS OF CALIFORNIA (U 5002 C); TCG SAN FRANCISCO (U 5454 C); TCG LOS ANGELES, INC. (U 5462 C); TCG SAN DIEGO (U 5389 C); AND AT&T MOBILITY LLC (NEW CINGULAR WIRELESS PCS, LLC (U 3060 C); CAGAL CELLULAR COMMUNICATIONS (U 3021 C); SANTA BARBARA CELLULAR SYSTEMS LTD. (U 3015 C); AND VISALIA CELLULAR TELEPHONE COMPANY (U 3014 C))** on all persons on the official service List in **R.06-06-028**, via e-mail, hand-delivery and/or first-class U.S. Mail.

Dated this 3<sup>rd</sup> day of October 2007 at San Francisco, California.

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# CALIFORNIA PUBLIC UTILITIES COMMISSION

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